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DOC #: \_\_\_\_\_  
DATE FILED: 12/27/2019

## MEMORANDUM ENDORSED

December 26, 2019

**VIA ECF**

Hon. Gregory H. Woods  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
Courtroom 12C  
500 Pearl Street  
New York, NY 10007

**Re: *WOW Virtual Reality, Inc. v. Alwaysfaith International Trade Co., Ltd. (Huizhou), et al.***  
**Civil Case No. 19-cv-5475 (GHW)**  
**Status Letter and Request to 1) Adjourn the Initial Pretrial Conference and 2) Move for Default Judgment**

Dear Judge Woods,

We represent Plaintiff WOW Virtual Reality, Inc. (“Plaintiff” or “WOW”) in the above-referenced action (the “Action”).<sup>1</sup> On December 8, 2019, the Court scheduled the Initial Pretrial Conference for January 2, 2020 at 1:30 p.m. For the reasons set forth below – namely that all remaining Defendants have defaulted – Plaintiff respectfully requests that the Court 1) indefinitely adjourn the Initial Pretrial Conference; and 2) allow Plaintiff to move for default judgment against the remaining Defendants by no later than January 27, 2020.

On June 12, 2019, Plaintiff filed this Action and thereafter, on June 28, 2019, the Court granted Plaintiff’s *ex parte* Application and entered the Temporary Restraining Order (“TRO”). On July 3, 2019, Plaintiff served the Summons, Complaint, TRO and all documents filed in support of Plaintiff’s Application on Defendants pursuant to the methods of alternative service authorized by the TRO. As such, all Defendants should have filed an Answer or Rule 12 Motion with the Court and served Plaintiff’s counsel with their respective Answers or Rule 12 Motions on or before July 24, 2019. To date, Defendants have neither filed with the Court nor served upon Plaintiff an Answer or Rule 12 Motion, and thirty (30) out of forty-one (41) Defendants remain in this action and have defaulted.<sup>2</sup> Therefore, Plaintiff

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<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary.

<sup>2</sup> The following eleven (11) Defendants were voluntarily dismissed from the action: Alwaysfaith International Trade Co., Ltd. (Huizhou), Dongguan Aromatec Packaging Co., Ltd., Guangzhou Trend Comm Electronic Company Limited, Hangzhou Sunnou I And E Ltd., Ningbo Pinbo Plastic Manufactory Co., Ltd., Shantou Chenghai Hanye Toys Industrial Co., Ltd., Shenzhen Chipskey Technology Co., Limited, Shenzhen Conzay Technology Limited, Shenzhen Sicily Technology Co., Ltd., Shenzhen Xinhualong Electronic Co., Ltd. and Yiwu City Magic World Imp. & Exp. Co., Ltd.

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respectfully requests that the Court 1) indefinitely adjourn the Initial Pretrial Conference; and 2) allow Plaintiff to move for default judgment against the remaining Defendants by no later than January 27, 2020.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

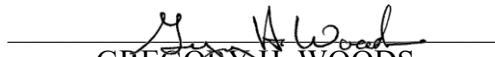
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Application denied. The initial pretrial conference will be held as scheduled on January 2, 2020.

Plaintiff is directed to serve this order on Defendants and retain proof of service.

SO ORDERED.

Dated: December 27, 2019  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge